

EXHIBIT 2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE ALUMINUM WAREHOUSING
ANTITRUST LITIGATION

MDL No. 2481
Master Docket No.
13-md-2481-KBF

This Document Relates To:

*Agfa Corporation and Agfa Graphics, N.V. v. The
Goldman Sachs Group, Inc.*, Case No. 1:14-cv-
0211-KBF (S.D.N.Y.)

*Eastman Kodak Company v. The Goldman Sachs
Group, Inc.*, Case No. 1:14-cv-06849-KBF
(S.D.N.Y.)

*Mag Instrument, Inc. v. The Goldman Sachs
Group, Inc.*, Case No. 1:14-cv-00217-KBF
(S.D.N.Y.)

**PLAINTIFFS AGFA CORPORATION'S, AGFA GRAPHICS, N.V.'S, EASTMAN
KODAK COMPANY'S, AND MAG INSTRUMENT, INC.'S FIRST SET OF
INTERROGATORIES TO DEFENDANTS JPMORGAN SECURITIES PLC, HENRY
BATH LLC, PACORINI METALS USA LLC, AND GLENCORE LTD.**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure Rule, Plaintiffs Agfa Corporation, Agfa Graphics, N.V., Eastman Kodak Company, and Mag Instruments, Inc. hereby request that Defendants JPMorgan Securities plc, Henry Bath LLC, Pacorini Metals USA LLC, and Glencore Ltd separately respond to the following interrogatories within the time allowed by the Federal Rules of Civil Procedure.

DEFINITIONS

The definitions and rules of construction set forth in Rule 26.3 of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York (the “Local Rules”) apply to these interrogatories. In addition, the following definitions apply:

1. “You,” and “Your” shall mean the Defendant responding to these Interrogatories.
2. “Aluminum” means the metallic chemical element, chemical symbol “Al,” atomic number 13, whether in the form of ingots, billets, sows, plates, sheets, foils, rods, bars, wires, or any other form, and whether pure or impure.
3. “Aluminum Warehouses” means LME-certified warehouses and non-LME-certified warehouses.
4. “Aluminum Warehousing” means the practice of storing, loading, or transporting Aluminum in, to, or from Aluminum Warehouses.
5. “December 2011 Aluminum Trade” means the aluminum trade between JPMorgan Chase & Co. and/or its affiliate(s) (collectively, “JPM”) and Glencore in December 2011, which is referred to in the October 30, 2014 letter submitted by counsel for JPMorgan Chase & Co. to the Permanent Subcommittee on Investigations of the United States Senate and produced to Plaintiffs with the control number JPMS-ALI-0385694-96. For convenience, a copy of the letter is attached hereto as Exhibit A.
6. “Including” shall be interpreted to mean “including but not limited to.”

INSTRUCTIONS

1. For the purposes of reading, interpreting, or construing the scope of these interrogatories, the terms used shall be construed broadly to the fullest extent of their meaning in a good faith effort to comply with the Federal Rules of Civil Procedure and the Local Rules.

2. Each of these interrogatories is continuing in nature, and requires a supplemental response in conformity with Fed. R. Civ. P. 26(e).

3. If, in answering these interrogatories, you claim any ambiguity in interpreting either the interrogatory or a definition or instruction applicable thereto, you should not use that claim as a basis for refusing to respond, but rather, you should set forth as part of your response the language deemed to be ambiguous and the interpretation chosen to be used in responding.

4. If you object to any interrogatory, please state with specificity the grounds for such objection. Any interrogatory to which an objection is made should be responded to insofar as it is not deemed objectionable.

INTERROGATORIES

1. Identify all persons involved in the December 2011 Aluminum Trade.¹

2. Identify all documents concerning the December 2011 Aluminum Trade.

3. Identify all persons involved in the cancellations of any warrant which was part of the December 2011 Aluminum Trade.

4. Identify the “clients, primarily investors” with whom or with which JPM transacted such that at or around the time of the December 2011 Aluminum Trade, it “held a substantial volume of LME aluminum futures contracts that were due to expire, resulting in physical settlement, on December 21, 2011....”, JPMS-ALI-0385694 (*see also* JPMS-ALI-0000424), and identify the date, quantity, location of aluminum, and parties involved in each such transaction.

¹ Consistent with the Local Rules, the term “persons” includes both legal and natural persons, *i.e.*, identify both the specific legal entities and the natural persons involved in any way in the transaction. The term “involved” also encompasses any logistics or aluminum warehousing concerning the December 2011 Aluminum Trade.

5. Identify all documents concerning the transactions referenced in Interrogatory

No. 4.

DATED: August 31, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2015, I caused the foregoing to be served on counsel of record for all parties via electronic mail using the email addresses maintained on the Court's ECF system.



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